

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD MARSCHALL,

Defendant.

NO. CR20-5270 RJB

STIPULATION OF THE PARTIES RE:  
PRIOR CONVICTION

COMES NOW the United States of America, by and through Tessa M. Gorman,  
Acting United States Attorney for the Western District of Washington and Marie M.  
Dalton and Nicholas Manheim, Assistant United States Attorneys for said District; and  
the Defendant, RICHARD MARSCHALL, and his attorneys, Mohammad Hamoudi and  
Gregory Geist; and hereby stipulate and agree that the following is true and correct, in  
lieu of witness testimony:

1. Defendant stipulates and agrees that he had been convicted of Introduction  
of a Misbranded Drug into Interstate Commerce under 21 U.S.C. §§ 331 and 333, on  
September 26, 2011, and that such conviction had become final before March 1, 2020.

Stipulation of the Parties - 1  
*U.S. v. Marshall*, CR20-5270 RJB

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

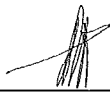
United States v. Marshall  
CR20-5270-RJB  
Plaintiff's Exhibit No. 30  
Admitted\_\_\_\_\_

1           2.     Defendant stipulates and agrees that he had been convicted of Introduction  
2 of a Misbranded Drug into Interstate Commerce under 21 U.S.C. §§ 331 and 333, on  
3 October 20, 2017, and that such conviction had become final before March 1, 2020.

4           3.     The parties agree that the foregoing facts are true and correct and that the  
5 jury may accept the above stated facts as if they had been proven beyond a reasonable  
6 doubt at trial. This Stipulation shall be read to the jury in lieu of witness testimony,  
7 admitted into evidence, and provided to the jury as an Exhibit.

8  
9           SO STIPULATED this 29<sup>th</sup> day of July, 2021.

10  
11  
12 Richard Marschall  
13 RICHARD MARSCHALL  
14 Defendant

  
MOHAMMAD HAMOUDI  
GREGORY GEIST  
Attorneys for Defendant

15  
16  
17 Marie Dalton  
18 MARIE M. DALTON  
19 NICHOLAS MANHEIM  
Assistant United States Attorneys

20  
21  
22  
23  
24  
25  
26  
27  
28  
Stipulation of the Parties - 2  
U.S. v. Marschall, CR20-5270 RJB

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970